

DONALD J. GREEN, ESQ.
LAW OFFICES OF DONALD J. GREEN
4760 S. Pecos Road, Suite 103
Las Vegas, Nevada 89121
Tel: (702) 388-2047
Fax: (855) 459-8472
CrimeLV7777@aol.com
Attorney for Defendant
CARLOS ALBERTO WENCES-OROZCO

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:15-cr-0072-GMN-NJK
)	
Plaintiff,)	
)	
vs.)	<u>STIPULATION FOR CONTINUANCE</u>
)	<u>OF SENTENCING DATE FROM</u>
CARLOS WENCES-OROZCO,)	<u>JANUARY 21, 2016</u>
)	
)	
)	<u>[SECOND REQUEST]</u>
Defendant.)	
_____)	

Certification: It is hereby certified that this Stipulation is filed in a timely manner.

COME NOW, UNITED STATES OF AMERICA, by and through United States Attorney DANIEL G. BOGDEN, ESQ., by and through Assistant United States Attorney SUSAN CUSHMAN, ESQ., and Defendant CARLOS ALBERTO WENCES-OROZCO, by and through his counsel, DONALD J. GREEN, ESQ., and respectfully submit the following Stipulation for a continuance of the sentencing date presently scheduled for JANUARY 21, 2016:

1. The Defendant is scheduled to be sentenced on JANUARY, 2016.
2. Defendant is in custody at the present time.

1 3. Defense counsel Green still needs additional time to
2 prepare for the sentencing and to meet with the defendant again to
3 review the sentencing phase of this case, given the defendant's criminal
4 history of incarceration.

5 4. Due to the necessity to grant defense counsel to prepare
6 other documents concerning sentencing matters, this Stipulation requests
7 a **CONTINUANCE** of Defendant's sentencing to the following dates (all of
8 which are on Thursdays) or at a time to be set by the Court at its
9 convenience:

10 A. **February 25, 2016;**

11 B. **March 3, 2016;**

12 C. **March 17, 2016**

13 5. This SECOND request for a continuance of the sentencing
14 date will allow the defense sufficient time within which to prepare for
15 the sentencing and/or other proceedings in this matter.

16 6. Defense counsel certifies to this Court that the
17 defendant was consulted about this request for continuance of the
18 sentencing and that the defendant consents to a continuance of the
19 sentencing.

20 7. This Stipulation for continuance of the sentencing does
21 not invoke any of the provisions of the Speedy Trial Act.

22 8. Denial of this request for a continuance could result in
23 a miscarriage of justice in that defense counsel would not be prepared
24 to present significant sentencing issues or other matters which might
25 impact on Defendant's case.

26 ...

27 ...

28 ...

1 9. This is the **SECOND REQUEST** for a stipulated continuance
2 of the sentencing of this matter.

3 LAW OFFICES OF DONALD J. GREEN

DANIEL G. BOGDEN, ESQ.
UNITED STATES ATTORNEY

4
5 BY /s/ Donald J. Green
DONALD J. GREEN, ESQ.
6 Nevada Bar No. 1869
4760 S. Pecos, #103
7 Las Vegas, Nevada 89121
Attorney for Defendant

BY /s/Susan Chushman
SUSAN CUSHMAN, ESQ.
Asst. U.S. Attorney
333 Las Vegas Blvd. #5000
Las Vegas, Nevada 89101
Attorney for Plaintiff

8
9
10 //

11 //

12 //

13 //

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:15-cr-0072-GMN-NJK
)	
Plaintiff,)	
)	
vs.)	<u>ORDER GRANTING CONTINUANCE</u>
)	<u>OF SENTENCING</u>
CARLOS A. WENCES-OROZCO,)	
)	
Defendant.)	
)	

The Court having read and considered the Stipulation for A Continuance of the Sentencing and the reasons in support thereof in the above-entitled matter; the Court further finding that the Stipulation does not invoke any provisions of the Speedy Trial Act; the Court further finding that defendant has been consulted about the request for a continuance of the sentencing and that the defendant consents to said continuance; and GOOD CAUSE THEREFOR:

IT IS HEREBY ORDERED that the sentencing of Defendant now scheduled for JANUARY, 2016 is hereby vacated.

IT IS FURTHER ORDERED that this matter shall be reset for sentencing on February 25 2016 at the hour of 11:00 a.m.

DATED this 14 day of JANUARY, 2016.



 GLORIA M. NAVARRO
 CHIEF UNITED STATES DISTRICT JUDGE